

Exhibit I

From: Walker, Leita <WalkerL@ballardspahr.com>
Sent: Friday, October 27, 2023 4:59 PM
To: matthewmonforton@yahoo.com; ian.prior@aflegal.org; nicholas.barry@aflegal.org
Cc: Berlin, Seth D.; Salomao Nascimento, Isabella; Mike Meloy
Subject: October 27 Letter re Talbot v. Ainuu et al.
Attachments: October 27 Letter.pdf

Counsel, please see attached letter. A hard copy will follow by mail.

Leita

Leita Walker

Ballard Spahr
LLP

2000 IDS Center, 80 South 8th Street
Minneapolis, MN 55402-2119
612.371.6222 DIRECT
612.371.3207 FAX

walkerl@ballardspahr.com
VCARD

www.ballardspahr.com

Ballard Spahr LLP

2000 IDS Center
80 South 8th Street
Minneapolis, MN 55402-2119
TEL 612.371.3211
FAX 612.371.3207
www.ballardspahr.com

Leita Walker
Tel: 612.371.6222
Fax: 612.371.3207
walkerl@ballardspahr.com

October 27, 2023

Via Email

Matthew Monforton
Monforton Law Offices, PLLC
32 Kelly Court
Bozeman, Montana 59718
Phone: (406) 570-2949
Fax: (406) 551-6919
matthewmonforton@yahoo.com

Nicholas R. Barry
Ian Prior
America First Legal Foundation
611 Pennsylvania Avenue SE, No. 231
Washington, D.C. 20003
Phone: (202) 964-3721
nicholas.barr@aflegal.org
ian.prior@aflegal.org

Re: *Johnathan Talbot v. Manoah Ainuu, et al.*
Case No. 2:23-cv-00066-BMM (D. Mont.)

Dear Counsel:

Along with the Meloy Law Firm, we represent VF Outdoor, LLC d/b/a The North Face (“TNF”), incorrectly sued as The North Face Apparel Corporation, and we write in connection with the above-referenced action. We will shortly be moving for pro hac vice admission.

We wanted to thank you at the outset for your professional courtesy in agreeing to extend the deadline to answer or otherwise respond to Mr. Talbot’s complaint until on or before December 19. The Meloy Law Firm will be filing an opposed motion to that effect with the court in the coming days.

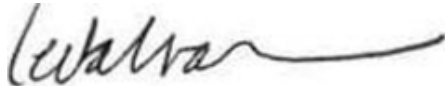
In the meantime, pursuant to Section 4.105.020 of the Revised Code of Washington (“RCW”), TNF hereby provides notice of its intent to file a special motion for expedited relief seeking dismissal of this action for failure to state a claim. We are providing this notice so that

Counsel
October 27, 2023
Page 2

your client has the opportunity now to withdraw or amend his complaint. Should TNF prevail on its special motion, it will be entitled, and will seek, to recover its attorneys' fees and costs under RCW 4.105.090.

The North Face reserves all of its rights and remedies. If you wish to discuss this matter, please feel free to contact us at your convenience.

Sincerely,

A handwritten signature in dark ink, appearing to read "Leita Walker", with a long, sweeping horizontal line extending to the right.

Leita Walker

Cc: Seth D. Berlin
Isabella Salomão Nascimento
Mike Meloy